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SEP 01 1993

August 27, 1993

Ms. Lynda Wedderspoon
Sites Management Section
Agency of Natural Resources
State of Vermont
103 South Main Street
Waterbury, VT 05671-0404

RE: Revisions to Site Investigation Report
Wiley's Garage, South Londonderry, VT
TSEC Project No. 93-010
SMS Site No. 91-1027

Dear Ms. Wedderspoon:

In a recent review of TSEC's site investigation report prepared for the above referenced site (June 3, 1993), I realized there were several errors which warrant notice and correction. Accordingly, I have revised the original report by preparing the attached document.

Items which have been corrected in the attached revision are summarized as follows:

1. **Section 3.0; paragraph 3; first sentence:** This sentence has been revised to read as follows "Currently, this site consists of: one (1) building which is used to repair automobiles; and, the remnants of a retaining **wall**/building foundation, which is attached to the existing site building."

2. **Section 5.1; paragraph 3 and Table 1:** The results of soil analysis which were summarized in this section of text and on Table 1, were incorrectly reported in ug/l. These results have been revised to the laboratory reported units of Parts per Billion (PPB).

   Furthermore, the sample result which corresponds to SB-1 was incorrectly reported in the referenced section of text as 65,070 ug/l. This result (which was correctly reported on Table 1), is actually 62,070 PPB.

3. **Section 5.1; paragraph 5 and Table 1:** The total petroleum hydrocarbon (TPH) data reported in the referenced paragraph and on Table 1 were incorrectly converted from the laboratory reported units of mg/kg to PPB. Furthermore these data were incorrectly reported as ug/l. Correctly converted, TPH data reported for samples collected from SB-1 and MW-3 were 2,700 PPB and 650,000 PPB respectively, not 0.0027 ug/l and 0.650 ug/l as originally reported.

   Based on the realization of this error, the statement that this parameter was detected in relatively low concentrations has been modified as noted.

5. **Section 5.2; paragraph 2:** Due to the proximity of the three on-site monitoring wells in relation to each other and the site building, it was not possible to accurately determine the direction of groundwater flow. This data, however, was used to estimate the flow of groundwater underlying the site. This paragraph as been revised accordingly.

6. **Figure 3:** The groundwater contour map, which was referenced in the report's text as Figure 3, was inadvertently left out of the final document. This figure has been included in the attached revision.

Please accept my apology for the inconvenience of these errors. If you have any questions or comments pertaining to this revision, please contact me. I can be reached at my home office (877-2423).

Very truly yours,

TWIN STATE ENVIRONMENTAL CORPORATION

Jennifer von Rohr

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Project Manager

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REVISED
SITE INVESTIGATION REPORT

WILEY'S GARAGE
S. LONDONDERRY, VT
SMS SITE NO. 91-1027

AUGUST 27, 1993

PREPARED FOR:

R.L. VALLEE, INC.
282 SOUTH MAIN STREET
ST. ALBANS, VT 05478

PREPARED BY:

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1.0 INTRODUCTION

This report has been prepared to summarize the activities conducted and the findings generated in association with a subsurface investigation conducted at Wiley's Garage in South Londonderry, Vermont (SMS Site No. 91-1027). The activities discussed were conducted in accordance with the Work Plan prepared for the site by NEIM and approved by the SMS.

As stated in the referenced Work Plan, the intent of the conducted tasks was to comply with the outstanding requirements imposed on the site by the Sites Management Section of the Vermont Agency of Natural Resources (SMS). These requirements and subsequently the tasks conducted focused on evaluating subsurface conditions relative to a release of petroleum which apparently had occurred at this location prior to April 1991.

Note that although the Work Plan for this project was prepared and initiated by NEIM, this report and the majority of the tasks described were conducted by Twin State Environmental Corporation (TSEC). Furthermore, the individuals involved with the project remained constant throughout it's implementation. All future correspondence related to this site should be forwarded to TSEC.

2.0 SITE BACKGROUND

This evaluation stems from the apparent release of gasoline at this location which was reported to have been discovered during the removal of three (3) underground storage tanks (USTs) in April 1991. Documentation of this removal, prepared by Mr. James H. Shippee (former site consultant) and dated April 20, 1991, indicates that evidence was encountered to conclude that two (2) of the three (3) excavated tanks had at one time released petroleum product to surrounding soils. In addition to an unquantified amount of soil contamination, evidence which lead to this conclusion includes the identification of a defective welded seam on one tank and the presence of approximately 200 gallons of water in the second tank. The third UST was reported to be in good condition with no holes identified.

Following the identification of subsurface conditions the following activities were apparently conducted:

- The excavated area was backfilled with the contaminated soil, broken-up pieces of the former pump island, and soil obtained from an off-site source.

- Mr. Shippee returned to the site to sample a drinking water well in use at the adjacent residential property located to the west. Analysis of this sample by EPA Method 8020 did not indicate that aromatic hydrocarbons had impacted this well.

  Mr. Shippee also conducted an evaluation of the site building's basement/crawlspace with the use of a photoionization detector (PID). This evaluation apparently revealed several detectable readings, however, no conclusive results were generated.

- In August 1991, Twin State Environmental Corp. (of White River Junction) became involved with the site and conducted several site activities which comprised a limited site investigation. This investigation included: screening of soils in the basement/crawlspace area, which reportedly revealed no evidence of petroleum contamination; and the installation of two (2) monitoring wells to reported depths of 6.6 feet and 7.3 feet. Soils encountered at each well location were also reportedly screened and found to be free from signs of petroleum contamination (as evidenced by visible observations and no detectable PID readings).

Twin State additionally sampled both monitoring wells for EPA Method 624 analysis, however, no information regarding sampling or purging techniques or quality assurance/quality control (QA/QC) measures were provided. Furthermore, a review of this data reveals acceptable holding times were exceeded for both samples, thus indicating the results to be of questionable integrity.

Available analytical data which was generated by the activities described above is provided in Appendix A of this report.

3.0 SITE SETTING AND LAYOUT

The Site Plan provided as Figure 1 illustrates the current site layout and additionally identifies the approximate locations of the three (3) former USTs.

The former tank identified as UST-1 was a 1,000 gallon UST previously used for gasoline storage. Upon excavation, this tank was found to contain a defective weld seal. The former UST-2 was also a 1,000 gallon tank apparently used for gasoline storage. No evidence was reported to indicate this tank had released product. UST-3 was a 500 gallon tank, with an unknown purpose. Apparently, this tank was not known to exist prior to the excavation activities initiated at this site, therefore, information is not available regarding it's use, installation or construction. Upon it's discovery, however, this tank was found to contain approximately 200 gallons of water.

Currently, this site consists of: one (1) building which is used to repair automobiles; and, the remnants of a retaining wall/building foundation which is attached to the existing site building. Petroleum products are no longer sold at this site, and reportedly, there are no active or closed in place USTs remaining at this location. The front portion of the site is paved and the site sloped from the north to the south, towards the West River.

This site, which is situated adjacent to the West River is located in a predominantly residential area. No commercial or industrial properties are believed to exist within the immediate vicinity of the site. No municipal water or sewer services are provided to this area. The location of this site is depicted by the Site Location Map provided as Figure 2.

4.0 SUMMARY OF PROJECT ACTIVITIES

As stated in the Draft Work Plan which was prepared for this site by NEIM, Inc. (November 10, 1992), the objectives of this investigation were to evaluate the subsurface conditions at the site, and to evaluate what impact, if any, has been imposed as a result of the apparent petroleum release. Of particular concern with respect to this site is the potential for impact on the adjacent West River.

In order to meet these objectives, the following activities were conducted in accordance with the current phase of site evaluation:

- Subsurface soils were screened for contamination and sampled for laboratory analysis at three (3) on-site locations;
- One (1) monitoring well was installed to compliment data generated from the two (2) previously existing monitoring wells;
- An ambient survey was conducted in the basement/crawlspace area of the site building with the use of a photoionization detector (PID);

- The newly installed monitoring well (MW-3) and the two (2) existing monitoring wells (MW-1 and MW-2) were surveyed for location and elevation data. This data was incorporated into the Site Plan;

- All three (3) monitoring wells were sampled for groundwater data and analysis;

- One drinking water well in use on an adjacent property was sampled for laboratory analysis; and,

- The bank of the West River was visually inspected for signs of seeps or contaminated originating from the site.

The following sections have been prepared to discuss the implementation of these activities and the data generated as a result.

4.1 Monitoring Well/Soil Boring Installations

Subsurface soils were evaluated visually and with the use of a PID at three (3) on-site locations through the installation of soil borings. One boring was additionally converted to a monitoring well in order to facilitate the generation of data representative of groundwater conditions underlying the site. The approximate locations of the soil borings (SB-1 and SB-2) and the surveyed locations of the newly installed monitoring well (MW-3) and the previously existing monitoring wells (MW-1 and MW-2) are depicted on Figure 1.

The locations selected for these soil boring/monitoring wells are intended to compliment data generated by the previous site activities, and subsequently address data gaps associated with the site. The logic used to locate all on-site monitoring wells and the specific intention of each drilled location is summarized as follows:

MW-1 was installed in October 1991, apparently to identify groundwater contamination migrating from the former source location around the site building's foundation. This well was installed to a depth of 6.6 feet below grade.

MW-2 was also installed October 1991, to evaluate groundwater migrating from the area of contamination around the building's foundation towards the West River. This well was installed on the west side of the site to a depth of 7.3 feet below grade.

MW-3 is situated immediately adjacent to the former UST area, closest to the location reported to exhibit the highest PID readings during the UST excavation activities. This well was installed during the current phase of evaluation to a depth of 6.9 feet below grade.

SB-1 was proposed to be installed in the area between the site building's east wall and the location of MW-1, however, the presence of a foundation/retaining wall prevented drilling in this location. SB-1, therefore was relocated to the area immediately east of the retaining wall. Screening of soils at this location was intended to detect contamination which may have migrated through subsurface soils from the former source and around the building foundation. This boring was completed to a depth of approximately 10 feet.

SB-2 was installed in the area between Wiley's Garage and the adjacent residence to the west, approximately halfway between the former contamination source and the West River. Soils encountered in this boring were screened to a depth of 5.5 feet in order to detect the presence of contamination in this area.

All drilling associated with the current phase of evaluation (SB-1, SB-2, and MW-3) was conducted by Adams Engineering with the use of a truck mounted drill rig equipped with soil augers. This drilling was conducted under the direction of NEIM, Inc. on January 26, 1993. Screening of soils encountered at each location was conducted by NEIM through visual observations and PID readings.

In addition to the on-site screening of soils encountered at each location, one sample was collected from each drilling location for the analysis of purgeable aromatic compounds by EPA Method 8240 and total petroleum hydrocarbons by Method 418.1. The results of these analysis are summarized along with corresponding PID readings form each location on Table 1 and the analytical report for these samples is provided in Appendix B. Additionally, these results are discussed in Section 5 below.

Provided in Appendix C are boring logs for SB-1, SB-2 and a well log for MW-3. Each log contains information pertaining to the conditions encountered at each drilled location, including soil descriptions and PID readings recorded. The well log additionally provides the details of construction for MW-3. Due to the lack of details pertaining to the construction of MW-1 and MW-2, no well logs have been provided for these monitoring wells.

As indicated on the well log for MW-3, this well was constructed of 1.5 inch diameter soil PVC casing and 0.006 inch slot size PVC screen. The area around the well screen was backfilled with clean filter sand to the areas above the bottom of the well casing. Slurry grout was then placed above the sand to the ground surface and the well was equipped with a flush mounted well guard. Following installation, this well was developed with the use of a peristaltic pump which removed approximately 5 gallons of water from this well. This development water, which appeared free from visible signs of contamination (including sheens) was discharged directly to the ground surface.

4.2 Well Survey

In order to generate information necessary for the periodic determination of groundwater flow relative to this site location, all three monitoring wells located at the site were surveyed for location and elevation data. This data has been incorporated into the Site Plan provided as Figure 1.

4.3 Groundwater Sampling

Groundwater sampling for the collection of data and analysis was conducted by TSEC on April 6, 1993. Sampling conducted at this time included the collection of water level elevation data, PID readings, and groundwater samples for the analysis of purgeable aromatics by EPA Method 8020.

In addition to the analysis of samples collected from each of the monitoring wells, this sampling event include the analysis of one (1) sample collected from a drinking water well in use on an adjacent property, and quality assurance/quality control (QA/QC) samples including one (1) duplicate sample, one (1) equipment bland and one (1) trip blank. Note that in order to moderate project costs, the equipment blank and trip blank samples were also used for QA/QC purposes on the R.B. Erskine project (SMS Site No.

91-1026), since similar sampling was conducted on the same day at both sites. For this reason, the trip blank and equipment blank sample results are reported on a separate analytical report.

The results of this sampling episode are presented in tabular form on Table numbers 2 and 3 and are discussed throughout Section 5.0 below. The laboratory report for these analytical results is provided in Appendix B.

4.4 Surrounding Well Survey

In order to address the potential that contamination may have migrated off-site and affected surrounding drinking water sources, a review of available water supply records was conducted. Information for this task was obtained from SMS files for this site and through the Vermont Department of Water Supply.

As a result of this file review, it was determined that within a 0.25 mile radius from the site, six (6) bedrock wells are present and likely to be in use. Of these six (6) wells five (5) are located upgradient from the site. The remaining bedrock well identified in the 0.25 mile radius is located approximately 1,200 feet downgradient and across the West River from the site.

This review additionally revealed there are no registered overburden wells within a 0.5 mile radius from the site, and one (1) bedrock community well is located approximately 5,000 feet downgradient from the site.

In order to identify drinking water sources within the vicinity of the site and gain access for sampling purposes, a door-to-door survey was conducted of residences surrounding the site. This survey, which was conducted by TSEC on April 6, 1993, resulted in the sampling of one (1) residential well located northwest of Wiley's Garage at the Swinburne Residence. No other residential wells within the vicinity of this site were accessible at the time of sampling.

4.5 Basement/Crawlspace Evaluation

Due to the concern for the potential for petroleum vapors to migrate from the area of contamination into the crawlspace area below the site building, a PID survey was conducted in this area by NEIM, Inc. during the January 26, 1993 site visit.

As requested by the SMS, this dirt-floored crawlspace (which is actually approximately 4 feet in height) was investigated through an ambient PID survey. This survey was conducted with the use of a PID calibrated to a benzene equivalent (isobutylene). Throughout this survey, an emphasis was placed on evaluating the foundation wall closest to the area of contamination, particularly in areas of cracks etc.

4.6 Riverbank Evaluation

In order to attempt to identify the migration of contamination from the site to the West River via seeps along the riverbank, a visual inspection was conducted of this area by TSEC on April 6, 1993. Potential signs of contamination which were scouted for in this area include dark or stained areas, oily sheens near the river's edge and seeps of oily or wet material along the riverbank.

5.0 RESULTS

This section has been prepared to present the results of data generated throughout the implementation of the tasks described above.

5.1 Soil Borings/Monitoring Wells

As discussed above, subsurface soils were evaluated with the use of a drill rig at three (3) biased locations on-site. Soils encountered at each location were screened with the use of a PID and through visual observations for the identification of contamination. One sample was then selected from a biased depth within the screened soil column for analysis.

As summarized on Table 1, (and as also indicated on the Boring/Well Logs), PID readings which increased with depth were encountered to a high of 285 parts per million (PPM) during the installation of MW-3. No PID readings or indications of petroleum contamination were detected during the drilling of SB-1 and SB-2.

The results of the soil samples collected for analysis are summarized along with the soil screening results on Table 1. As indicated, although no PID readings were detected from any soil screened from SB-1 or SB-2, all of the samples analyzed revealed detectable concentrations of purgeable aromatic compounds. Specifically, these compounds as total benzene, toluene, ethylbenzene and xylenes (BTEX) were detected in concentrations ranging from a low of 236.5 parts per billion (PPB) total BTEX reported in the sample from SB-1, to the highest concentrations of 62,070 PPB which was reported for the sample from MW-3. The total BTEX result reported for the sample collected from SB-2 was 409.9 PPB.

A review of the specific compounds detected in each of the samples analyzed reveals that all of the samples contained detectable concentrations of toluene and xylene compounds. Furthermore, in each case, these compounds were detected in higher concentrations than other compounds detected in the same sample.

In addition to the total BTEX results, Table 1 indicates that total petroleum hydrocarbons were detected in samples collected from SB-1 and MW-3 in concentrations of 2,700 PPB and 650,000 PPB respectively. This parameter was not detected in the sample collected of SB-2.

5.2 Groundwater Sampling

Provided on Table 2 is a summary of the monitoring well field measurements collected by TSEC during the groundwater sampling aspect of this project. Data included in this summary are water level elevation data, and PID readings collected in the well headspace.

In addition, the water level elevation data has been used to estimate groundwater flow within the vicinity of the site. This drawing which is provided as Figure 3 illustrates that groundwater is believed to flow from north to south, towards the West River.

This groundwater sampling event, conducted on April 6, 1993 by TSEC, included the collection of data and samples for analysis from monitoring well numbers MW-1, MW-2 and MW-3. The results of these samples, along with the QA/QC samples are reported on Table 3.

As summarized on Table 3, of the samples analyzed, only those collected from MW-3 revealed detectable concentrations of purgeable aromatic compounds. The total BTEX concentration reported for MW-3 was 19,900 ug/l and the reported MTBE concentration for this well was 380 ug/l. Similarly, a duplicate sample collected from this well was reported to contain 20,640 ug/l total BTEX and 393 ug/l MTBE. Both samples from this well were reported to contain 48% toluene, 44% xylenes and 8% ethylbenzene. This well additionally contained an unquantifiable concentration (i.e. below the detection limit) of the compound benzene.

Also summarized on Table 3 is the data generated by the analysis of the equipment blank (EB-1) and the trip blank (TB-1). These results indicate that the equipment blank was free from contamination. The laboratory prepared trip blank however, was reported to contain low yet detectable concentrations of the compounds toluene and xylene. Since it is not likely that the trip blank became contaminated during the sampling episode, the source of trip blank contamination is assumed to be from the laboratory. This occurrence of contamination in the trip blank is not considered significant.

The laboratory report for these samples is provided in Appendix B.

5.3 Surrounding Well Survey

As discussed above, one (1) drinking water sample was collected from a nearby residence for the analysis of purgeable aromatics by EPA Method 8020. The results of this sample are reported as sample number RS-1 on Table 3. As reported, no compounds were detected by the analysis of this sample.

5.4 Basement/Crawlspace Evaluation

As indicated, an evaluation of the basement/crawlspace area located below the site building was conducted with the use of a PID calibrated to isobutylene, a benzene equivalent. This survey was conducted by monitoring ambient air within this area and through the collection of PID readings at biased locations closest to the former source of contamination, particularly foundation cracks etc. in this area.

This survey, which was conducted by NEIM, Inc. on January 26, 1993, revealed no positive PID readings within this basement/crawlspace area.

5.5 Riverbank Evaluation

In order to attempt to identify the migration of petroleum contamination from the site to the West River, TSEC conducted a visual riverbank evaluation during the early spring thaw (April 6, 1993). As a result of this inspection, no visible signs of contamination were encountered in this area.

6.0 Conclusions and Recommendations

Based on the data and findings generated by the current phase of site evaluation, TSEC has developed the following conclusions relative to the Wiley's Garage site:

- Subsurface contamination and it's apparent sources, including two (2) USTs were identified at the site in 1991. Both apparent sources and one additional potential source of contamination (a third UST) were removed from the site, leaving no known potential sources of contamination.

- Petroleum contaminated soil which had been excavated from the former UST area during the course of the UST removals, was backfilled into the UST excavation. This area was later paved.

- The identification of subsurface petroleum contamination resulted in the implementation of several phases of investigation activities at this site. Many of these activities yielded inconclusive and in certain instances, invalid results.

- The findings of this phase of investigation indicate that subsurface soil and groundwater contamination is present within the vicinity of the former tank area. Investigated areas located outward from the former tank area are found by analysis to contain low levels of soil contamination (< 5 mg/kg total BTEX), and no detectable groundwater contamination. The extent of subsurface contamination is therefore not believed to be extensive.

- No data or observations have been developed which indicates contamination has (or is) migrated (migrating) off-site.

- No potential receptors of contamination within the immediate vicinity of the site are believed to be at risk of contamination.

As a result of these conclusions, TSEC does not believe the remaining contamination is of significance to warrant the implementation of further investigation or remedial actions. TSEC does however feel that in order to monitor changes in the site conditions, it will be appropriate to implement periodic groundwater monitoring at the site. TSEC recommends that his monitoring be initially conducted on a quarterly basis and include the collection of groundwater data and samples for Method 8020 analysis from all of the existing monitoring wells.

As appropriate, the quarterly monitoring reports submitted to the SMS should provide recommendations based on the development of new data.

TABLES

TABLE 1
SUMMARY OF SOIL SCREENING
AND
ANALYSIS
WILEY'S GARAGE
S. LONDONDERRY, VERMONT
MAY 4, 1993

			RESULTS (PPB)					
Boring Well #	Depth (feet)	PID Reading (PPM)	Benzene	Toluene	Ethyl benzene	Xylenes	Total BTEX	TPH
SB-1	0 - 5	ND	-	-	-	-	-	-
	5 - 10	ND	45.5	145.0	ND	46.0	236.5	2,700
SB-2	0 - 5	ND	-	-	-	-	-	-
	5 - 5.5	ND	42.4	210.0	26.7	130.8	409.9	ND
MW-3	0 - 0.5	ND	-	-	-	-	-	-
	0.5 - 2.0	4.0	-	-	-	-	-	-
	2.0 - 5.0	269	ND	12,800	7,170	42,100	62,070	650,000
	5.0 - 7.0	285						

Notes:

- TPH indicates total petroleum hydrocarbons.
- - indicates no sample was collected from the depth interval indicated.
- ND indicates identified parameter was not detected above the method detection limit.
- All results are reported in parts per billion (PPB).
- PID readings collected with the use of a Thermo Instruments OVM calibrated to isobutylene (a benzene equivalent).
- Laboratory reports for the analytical data reported above is provided in Appendix B.
- The soil boring and well locations are illustrated on Figure 1.

TABLE 2
SUMMARY OF MONITORING
WELL DATA
WILEY'S GARAGE
S. LONDONDERRY, VERMONT
APRIL 6, 1993

Well No.	TOC Elevation	Measured Depth to Water (ft)	Water Level Elevation (ft)	PID Readings (PPM)
MW-1	98.61	6.77	91.84	ND
MW-2	99.20	6.28	92.92	ND
MW-3	99.69	7.08	92.61	793

Notes:

- Data listed above collected by TSEC on April 6, 1993.
- TOC elevation indicates elevation at top of well casing.
- PID indicates photoionization detector. All PID readings collected with a Thermo Instruments OVM calibrated to isobutylene (a benzene equivalent).
- All elevation data are reported in feet relative to a temporary bench mark.

TABLE 3
SUMMARY OF ANALYTICAL RESULTS
MONITORING WELL & RESIDENTIAL WELL SAMPLING
WILEY'S GARAGE
S. LONDONDERRY, VERMONT
APRIL 6, 1993

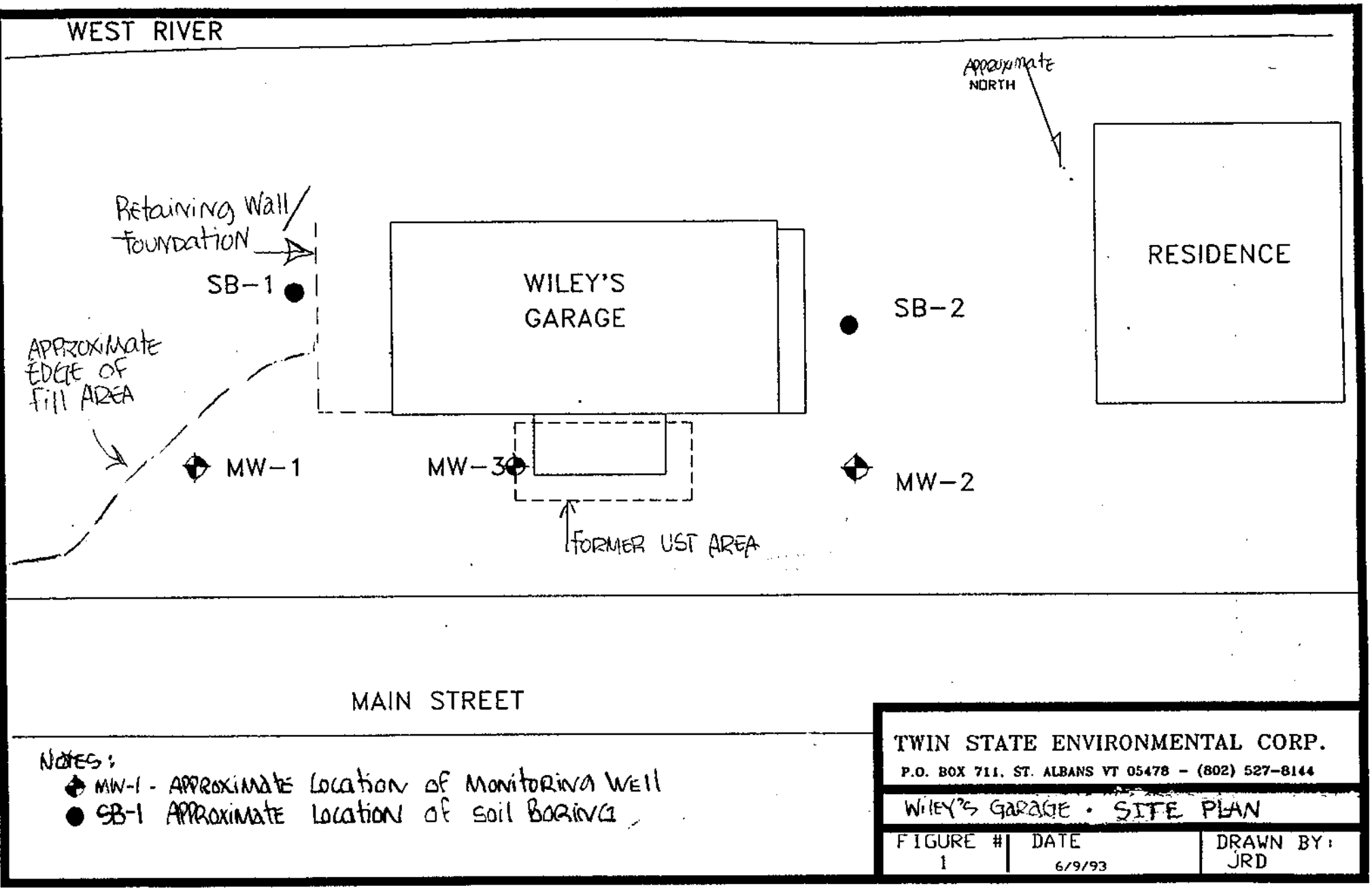
Results (ug/l)

Sample ID.	Benzene	Toluene	Ethyl benzene	Xylenes	Total BTEX	MTBE
MW-1	ND	ND	ND	ND	-	ND
MW-2	ND	ND	ND	ND	-	ND
MW-3	BDL	9,470	1,600	8,830	19,900	380
MW-3D	BDL	9,830	1,670	9,140	20,640	393
RS-1	ND	ND	ND	ND	-	ND
EB-1	ND	ND	ND	ND	-	ND
TB-1	ND	1.4	ND	3.7	5.1	ND

Notes:

- ND indicates identified compound was not detected above method detection limit.
- BDL indicates identified compound was detected at a concentration below the method detection limit.
- MW-3D is a duplicate sample collected from MW-3.
- RS-1 represents the residential drinking water well which was sampled for this investigation (Swinburne Residence).
- EB-1 indicates field prepared equipment blank.
- TB-1 indicates laboratory prepared trip blank.
- Monitoring well locations are identified on Figure 1.
- All sampling reported above conducted by TSEC on April 6, 1993.
- All analysis conducted by Endyne, Inc. using EPA method 8020.
- Only compounds detected in one or more samples are listed above.
- Laboratory reports for the results reported above are provided in Appendix B.

FIGURES



NOTES:
- ◆ MW-1 - APPROXIMATE LOCATION OF MONITORING WELL
- ● SB-1 APPROXIMATE LOCATION OF SOIL BORING

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WILEY'S GARAGE - SITE PLAN

FIGURE #	DATE	DRAWN BY:
1	6/9/93	JRD

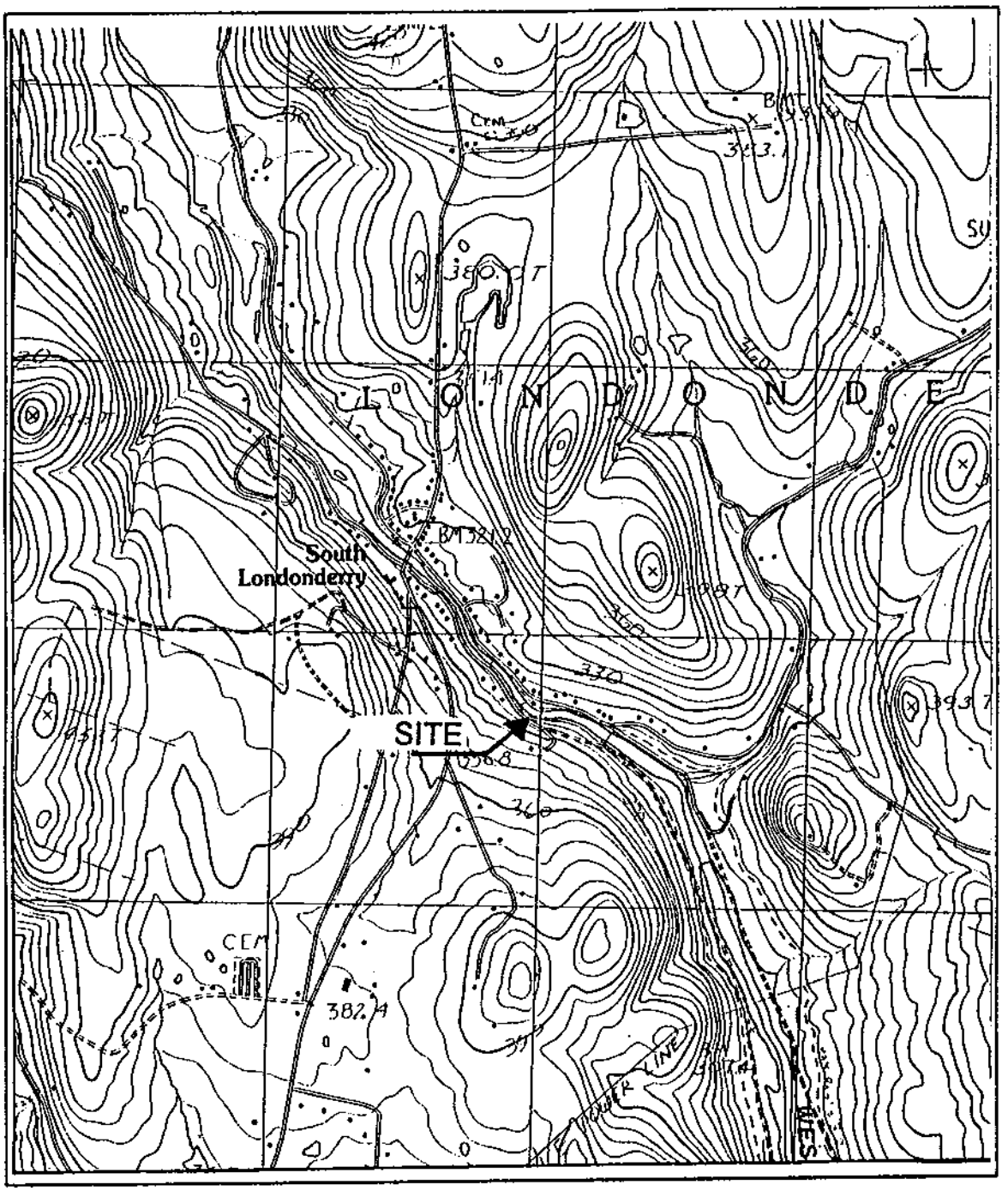

FIGURE 2

SITE LOCATION MAP
WILEY'S GARAGE
SOUTH LONDONDERRY, VT

SOURCE: USGS QUAD MAP
LONDONDERRY, VERMONT
SCALE: 1:24,000